

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

WALTER HAMMOCK, derivatively on behalf
of Nominal Defendant, ELECTRONIC ARTS,
INC.

Plaintiff,

v.

Civil Case No. C-05-02009-MMC

M. RICHARD ASHER, et al.,

Defendants,

and

ELECTRONIC ARTS, INC.,

Nominal Defendant.

**[PROPOSED] ORDER APPOINTING
LEAD PLAINTIFF AND LEAD
DERIVATIVE COUNSEL AND
CONSOLIDATING ACTIONS**

MICHELE SINDONA, derivatively on behalf
of Nominal Defendant, ELECTRONIC ARTS,
INC.

Plaintiff.

v.

Civil Case No. C-05-02644-JSW

M. RICHARD ASHER, et al.

Defendants.

and

ELECTRONIC ARTS, INC.

Nominal Defendant

The Unopposed Motion of Plaintiffs Walter Hammock and Michelle Sindona to

Consolidate Derivative Actions to Appoint Lead Derivative Counsel and Appoint

1 Leadership Structure for Plaintiffs is before the Court for consideration. Defendants
2 do not oppose the entry of this Order.¹ Plaintiffs' Motion is granted.

3 IT IS ORDERED, ADJUDGED AND DECREED that:

4
5 1. The above-captioned actions are consolidated for all purposes. The
6 caption of each document filed hereafter shall provide:

7 In re: ELECTRONIC ARTS, INC. DERIVATIVE LITIGATION
8 Civil Case No. C-05-02009-MMC,
9 Consolidated with: C-05-02644-MMC.

10 All future filings shall be in Case No. C-05-2009.

11 2. The Court hereby appoints William B. Federman and Federman &
12 Sherwood as Lead Counsel and Mary E. Alexander and Mary Alexander & Associates
13 as Liaison Counsel for the Plaintiffs in this consolidated derivative action. The Court
14 hereby appoints Michael Goldberg and Glancy, Binkow & Goldberg and Thomas J.
15 McKenna and Gainey & McKenna to the Executive Committee. Lead Counsel shall
16 be responsible for the prosecution of the Derivative Action and shall coordinate and
17 direct on behalf of any and all Plaintiffs: (i) all pre-trial discovery proceedings; (ii)
18 briefing and argument of motions; (iii) meetings of Plaintiffs' counsel for purposes of
19 proposing joint actions as deemed necessary; (iv) expert discovery; (v) the preparation
20 for and trial of the Derivative Action and (vi) any and all settlement negotiations with
21 Defendants. Defendants' counsel may rely upon all agreements made with Plaintiffs'
22 Lead Counsel, or other duly authorized representative of Plaintiffs' Lead Counsel, and
23 such agreements shall be binding on Plaintiffs.

24
25 3. All subsequently filed federal derivative actions ^{filed in this District and} _A raising issues against
26 any or all of the Defendants that are the same as or similar to those raised in the
27
28

29
1 ¹ Defendants take no position concerning the appointment of lead plaintiffs and the
lead counsel structure.

1 original federal Shareholder Derivative Complaint filed in the above-styled suit (the
2 "Federal Derivative Complaint") shall be automatically consolidated with this action.

3 4. No later than September 12, 2005, plaintiffs shall file a consolidated complaint.
SIGNED this 12th day of August, 2005.

5 
6 HONORABLE MAXINE M. CHESNEY,
7 UNITED STATES DISTRICT COURT JUDGE

8 APPROVED AS TO FORM:

9 s/Mary E. Alexander

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